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June 13, 2006

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RECEIVER: Examiner Bharat Barot	**OUR FILE REF: SONYP009**
COMPANY:. UNITED STATES PATENT & TRADEMARK OFFICE	YOUR FILE REF: 09/846,115

Message:

Dear Mr. Barot:

Attached please find our Response to Arguments.

Best regards,

Konrad Chan

Appl. No. 09/846,115

PATENT

FOR EXAMINER CONFERENCE CALL DISCUSSION

ONLY.

ATTN: EXAMINER BHARAT BAROT

Please call Applicant's Attorney:

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June 13, 2006

Response to Arguments

In response to Examiner's arguments on Page 6 of the Office Action mailed March 30, 2006, please note that Dietz does not teach all of the claimed elements of Applicant's invention. Although there are other differences, one difference is that Dietz fails to teach the application of an *expression* to the content data. The cited portions of Dietz particularly reference the ability to translate languages and do not teach the application of an expression as claimed.

Applicant's claimed invention identifies an *expression* to be applied to the content data. The term "expression" is in no way analogous to the term "translate". Taking the broadest interpretation or definition of translate would still not cover the claimed application of expression. Without the use of extrinsic evidence or referencing the specification, the definition of "expression", as found in the claims, cannot be covered by the term "translate" as taught by Dietz. This is because even broadly defined, "translate" means "to convert" which is wholly incongruous with the term "expression".

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